

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA,)
Plaintiff)
)
v.) Case No.:
) 1:13-cv-00213-PB
SCOTT G. BAKER and ROBYN BAKER,)
DEFENDANT)

ANSWER OF DEFENDANT ROBYN BAKER AND JURY DEMAND

Defendant Robyn Baker, in answer to the Complaint filed in the above-entitled case, admits, denies, and responds as follows:

1. No response is required to the extent that this paragraph requires a legal opinion; denies the remaining allegations of this paragraph.
2. Denies.
3. Admits Robyn Baker claims an interest in the subject property; denies the remaining allegations of this paragraph.
4. Admits.
5. Admits.
6. Admits.
7. Admits.
8. Denies for lack of knowledge.

9. Denies for lack of knowledge.

10. Denies for lack of knowledge.

11. No response is required to the extent that this paragraph requires a legal opinion; denies the remaining allegations of this paragraph.

12. Denies for lack of knowledge.

AFFIRMATIVE DEFENSES

As for their affirmative defenses, the defendant asserts and states as follows:

FIRST AFFIRMATIVE DEFENSE

The plaintiff's tax liens did not attach to the subject properties because both properties were transferred for adequate consideration to solely to Defendant Robyn Baker pursuant to the Massachusetts Probate and Family Court's Judgment of Divorce entered February 28, 2008, which became final on May 29, 2008.

DEFENDANT DEMANDS A JURY TRIAL ON ALL ISSUES SO TRIABLE

WHEREFORE, it is prayed that the relief sought in the Complaint be denied and any other relief deemed appropriate by this Honorable Court.

Defendant Robyn Baker,
By her Attorney,

/s/ Terri L. Pastori
Terri L. Pastori (NH Bar No.12136)
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Date: June 10, 2013

CERTIFICATE OF SERVICE

I hereby certify that on 6/10/13, I forwarded a copy of the foregoing document to the plaintiff's counsel of record via ECF:

Michael R. Pahl
United States Department of Justice
Civit Tax Central
P.O. Box 7238
Washington, D.C. 20044

/s/ Terri L. Pastori
Terri L. Pastori